# IN THE UNTED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| DAVID BISACCA  | : CIVIL ACTION  |
|--|---|
| Plaintiff,   | : No. 21-00333  |
| v.   | :<br>:  |
| JMP LOGISTICS, INC.<br>and<br>AMAZON LOGISTICS, INC. | :<br>:<br>:   |
| Defendants.  | :<br>:<br>:   |
|  | <u>ORDER</u>  |
| AND NOW, this day of                                 | , 2021, upon consideration of                         |
| Plaintiff's and Defendant Amazon Logistic            | cs, Inc.'s ("Amazon") Unopposed Motion for Leave to   |
| Appear via Telephone for the June 23, 202            | 1 Initial Case Management Conference ("Conference"),  |
| it is hereby <b>ORDERED</b> and <b>DECREED</b> t     | that the Motion is <b>GRANTED</b> .                   |
| Counsel for Plaintiff and Amazon                     | n shall be permitted to appear at the Conference via  |
| telephone. Counsel for Plaintiff shall circu         | ulate a conference call-in number to Chambers and all |
| counsel at least three (3) days prior to the (       | Conference.   |
|  | BY THE COURT  |
|  | The Honorable David Stewart Cercone, U.S.D.J.         |

#### IN THE UNTED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DAVID BISACCA **CIVIL ACTION** 

> Plaintiff, No. 21-00333

JMP LOGISTICS, INC.

and

v.

AMAZON LOGISTICS, INC.

Defendants.

### UNOPPOSED MOTION BY PLAINTIFF AND DEFENDANT AMAZON LOGISTICS, INC. FOR LEAVE TO APPEAR VIA TELEPHONE FOR THE INITIAL CASE MANAGEMENT CONFERENCE

The undersigned counsel, hereby file the instant Motion for Leave to Appear via Telephone for the June 23, 2021 Initial Case Management Conference, and state as follows in support of the instant Motion:

- The Initial Case Management Conference in this matter is currently scheduled for 1. June 23, 2021 at 1:00 p.m. in Pittsburgh.
- 2. Per the Court's Order trial counsel and all unrepresented parties shall be present at the conference.
  - 3. The undersigned are trial counsel for their respective clients in this matter.
- Plaintiff's undersigned counsel's office is located in Bensalem, Pennsylvania, 4. which is more than 300 miles from the Pittsburgh Courthouse. Defendant Amazon Logistics, Inc.'s counsel's office is located in midtown Manhattan, which is approximately 400 miles away.

5. Both undersigned counsel's respective clients are responsible for paying their counsel's costs in this matter. In an effort to conserve the time, costs and fees associated with travel from Bensalem and Manhattan to Pittsburgh, we respectfully request leave to appear via telephone for the June 23, 2021 Initial Case Management Conference.

6. We have conferred with counsel for Defendant JMP Logistics, Inc. who has no objection to this request.

**WHEREFORE**, we respectfully request that the Court grant this Motion.

#### Respectfully submitted,

/s/ Adam C. Lease

Adam C. Lease, Esq. Karpf, Karpf & Cerutti, P.C. 3331 Street Road Two Greenwood Square, Suite 128 Bensalem, PA 19020

(215) 639-0801

Attorneys for Plaintiff

/s/ Gabrielle F. Levin

Gabrielle F. Levin, Esq. Gibson, Dunn and Crutcher LLP 200 Park Avenue

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Attorneys for Defendant Amazon Logistics, Inc.

Date: May 20, 2021

## IN THE UNTED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DAVID BISACCA : CIVIL ACTION

. CIVIL ACTION

Plaintiff, : No. 21-00333

JMP LOGISTICS, INC.

and

AMAZON LOGISTICS, INC.

v.

Defendants.

**CERTIFICATE OF SERVICE** 

I certify on the date set forth below that I served Defendants with Plaintiff's Unopposed Motion to for Leave to Appear via Telephone for the Initial Case Management at the following address via ECF only through Defendants' counsel of record:

Gabrielle Levin, Esq, Gibson Dunn 200 Park Avenue New York, NY 10166

Jason C. Schwartz, Esq. Gibson Dunn & Crutcher 1050 Connecticut Avenue, NW Washington, DC 20036

Jennifer G. Betts, Esq.
Ogletree Deakins Nash Smoak & Stewart
One PPG Place
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Pittsburgh, PA 15222

/s/ Adam C. Lease Adam C. Lease, Esq.

Dated: May 20, 2021